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Filing date: **12/20/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91186611
Party	Plaintiff Bear Naked, Inc.
Correspondence Address	ELIZABETH K BROCK HARNESS DICKEY & PIERCE PLC 5445 CORPORATE DRIVE, SUITE 200 TROY, MI 48098 UNITED STATES ebroch@hdp.com, tjcomparoni@hdp.com
Submission	Motion to Extend
Filer's Name	Elizabeth K. Brock
Filer's e-mail	ebroch@hdp.com, tjcomparoni@hdp.com
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Date	12/20/2011
Attachments	91186611 NAKED BAR 228 122011.pdf (3 pages)(81888 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Bear Naked, Inc.)	
Opposer,)	
)	Opposition No. 91186611
v.)	Serial No. 76/677088
)	Mark: NAKED BAR
Sean Sangsoo Lee)	
Applicant.)	
)	

**CONSENTED MOTION TO EXTEND
DISCLOSURE AND TRIAL PERIODS**

Opposer, Bear Naked, Inc., respectfully requests that disclosure and trial dates be extended for a period of sixty (60) days in order to allow the parties additional time to finalize settlement in this matter. Kevin S. Kim, counsel for Applicant, has consented to this motion to extend these dates.

Since the institution of the opposition, the parties have been engaged in settlement negotiations and have exchanged settlement proposals. Opposer has served discovery requests and Applicant's responses remain outstanding. Applicant did not serve discovery requests on Opposer. Discovery is now closed.


Since the time of the last request for suspension, the parties have finalized a Settlement Agreement. Applicant has executed the Agreement. Currently, Opposer requires additional time to execute the Agreement. The parties will also require additional time to implement the terms of the executed Settlement Agreement. It is expected that Opposer will execute the Settlement Agreement and the parties will implement the terms of the Settlement Agreement well within the requested extension period.

In light of the settlement between the parties and since this request is made for good cause and not made simply for purposes of delay, it is respectfully requested that the disclosure and trial dates be extended as follows:

Discovery Closes	CLOSED
Plaintiff's Pretrial Disclosures	02/22/12
Plaintiff's 30-Day Trial Period Ends	04/07/12
Defendant's Pretrial Disclosures	04/22/12
Defendant's 30-Day Trial Period Ends	06/06/12
Plaintiff's Rebuttal Disclosures	06/21/12
Plaintiff's 15-Day Rebuttal Period Ends	07/21/12

Respectfully submitted,

Date: December 20, 2011

By: 
Lisabeth H. Coakley, Esq.
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Attorneys for Bear Naked, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Consented Motion to Extend Disclosure and Trial Periods has been served on counsel for Applicant, Kevin S. Kim, by agreement, via e-mail addressed to ksk@kimlawyers.com, on December 20, 2011.



Timothy J. Comparoni